

## Performance Audit

# Arizona Department of Education School Safety Program

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Department did not ensure some schools that received Program monies complied with Program requirements intended to enhance school safety personnel effectiveness and improve school safety, and 2025 legislation expanded allowable uses of Program monies



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## ARIZONA AUDITOR GENERAL

**Lindsey A. Perry**, Auditor General

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August 7, 2025

Members of the Arizona Legislature

The Honorable Katie Hobbs, Governor

The Honorable Tom Horne, State Superintendent of Public Instruction  
Arizona Department of Education

Transmitted herewith is the Auditor General's report, *A Performance Audit of the Arizona Department of Education—School Safety Program*. This report is in response to a November 21, 2022, resolution of the Joint Legislative Audit Committee. The performance audit was conducted pursuant to Arizona Revised Statutes §41-2958, which requires the Joint Legislative Audit Committee to review the Department every 10 years, and A.R.S. §15-154(L), which requires the Auditor General to include the School Safety Program as part of its ongoing sunset review of agencies and programs. I am also transmitting within this report a copy of the Report Highlights to provide a quick summary for your convenience.

As outlined in its response, the Department agrees with the finding and plans to implement all the recommendations. My Office will follow up with the Department in 6 months to assess its progress in implementing the recommendations. I express my appreciation to State Superintendent of Public Instruction Horne, Department staff, and sampled school staff for their cooperation and assistance throughout the audit.

My staff and I will be pleased to discuss or clarify items in the report.

Sincerely,

*Lindsey A. Perry*

Lindsey A. Perry, CPA, CFE  
Auditor General

## Arizona Department of Education School Safety Program (Program)

Department did not ensure some schools that received Program monies complied with Program requirements intended to enhance school safety personnel effectiveness and improve school safety, and 2025 legislation expanded allowable uses of Program monies

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### Audit purpose

To determine whether the Department ensured participating public school district and charter school sites (schools) complied with Program requirements intended to enhance school safety personnel effectiveness and improve school safety.<sup>1</sup>

### Key findings

- ▶ Department awarded \$128.3 million in Program monies to 1,153 schools in fiscal year 2025 to place 1,086 school resource officers, school counselors, and other school safety personnel on school campuses.
- ▶ Department took steps to help participating schools fill school safety positions including hiring a contractor to help place off-duty officers on campuses.
- ▶ Department established Program requirements for participating schools that are intended to enhance school safety personnel effectiveness and improve school safety, such as training staff and implementing an operational plan to identify and address safety risks.
- ▶ Department did not ensure that 15 of 16 schools we reviewed complied with all Program requirements, including not developing operational plans, which could limit these schools' ability to enhance school safety personnel effectiveness and improve school safety.
- ▶ Department did not conduct some important monitoring activities and instead relied mainly on schools providing written acknowledgments of Program compliance.
- ▶ Legislation enacted in 2025 revised statutory Program provisions, including authorizing schools to use Program monies to purchase safety technology, provide staff training, and make infrastructure improvements related to school safety.

### Key recommendations to the Department

- ▶ Monitor schools receiving Program monies to ensure they comply with Program requirements, such as by conducting risk assessments and site visits, and work with schools to address any identified noncompliance.

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<sup>1</sup> The Arizona Auditor General conducted this performance audit of the Department's Program pursuant to a November 21, 2022, resolution of the Joint Legislative Audit Committee and Arizona Revised Statutes (A.R.S.) §41-2958 and A.R.S. §15-154(L).

## INTRODUCTION

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- ▶ School safety issues across the country and in Arizona highlight the need for emergency planning and preparedness
- ▶ Program established to support, promote, and enhance safe and effective learning environments by funding school safety personnel
- ▶ Program awards and funding have grown since 2018
- ▶ Department awarded Program grants for school safety positions in all 15 Arizona counties
- ▶ Department established various Program requirements intended to enhance school safety personnel effectiveness and improve school safety
- ▶ Organization and staffing
- ▶ Revenues and expenditures

## FINDING 1

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### **Department did not ensure all schools receiving Program monies complied with Program requirements intended to enhance school safety personnel effectiveness and improve school safety**

- ▶ Department distributed more than \$1 million of Program monies to schools we reviewed that did not comply with all Program requirements intended to enhance school safety personnel effectiveness and improve school safety
- ▶ Operational plans
- ▶ Training
- ▶ Safety Teams
- ▶ Activity logs
- ▶ Program expenditure reports
- ▶ Multiple factors contributed to the Department not ensuring schools complied with Program requirements

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- ▶ Question 1: What legislation enacted in 2025 during the Fifty-seventh Legislature, first regular session, impacted the Program?
- ▶ Question 2: Do other states have a competitive grant program similar to Arizona’s Program?
- ▶ Question 3: How do Arizona’s practices and requirements for placing school safety positions, including officers, school counselors, and school social workers, on school campuses compare to the other states we reviewed?
- ▶ Question 4: What additional efforts has the Department implemented to improve school safety in Arizona?
- ▶ Question 5: What are some similar efforts to improve school safety that other states we reviewed have implemented?
- ▶ Question 6: What criteria does the Department use when awarding Program grants to schools?
- ▶ Question 7: What outreach has the Department conducted to inform schools about the Program?
- ▶ Question 8: What has the Department done to help schools participating in the Program fill officer positions?

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Fiscal year 2024



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# INTRODUCTION

The Arizona Auditor General has completed a performance audit of the Arizona Department of Education's (Department) School Safety Program (Program), pursuant to Arizona Revised Statutes (A.R.S.) §41-2958 and A.R.S. §15-154(L). This audit was conducted under the authority vested in the Auditor General by A.R.S. §41-1279.03 and determined whether the Department ensured public school district and charter school sites (schools) that received Program monies complied with various Program requirements intended to enhance school safety personnel effectiveness and improve school safety, as required by statute.<sup>1</sup> The report also includes a Questions and Answers section related to other states' school safety programs; information related to the Program's grant-awarding criteria, efforts to fill school resource officer positions, and outreach activities; and legislation that could impact the Program.

## **School safety issues across the country and in Arizona highlight the need for emergency planning and preparedness**

As discussed in our 2024 school safety special audit report on emergency operations planning, school safety issues across the country and in Arizona highlight the need for emergency planning and preparedness, and the Department's School Safety Program contributes to school safety efforts.<sup>2</sup> Between 2018 and 2024, 221 school shootings in the U.S. resulted in 140 deaths and 376 people injured.<sup>3</sup> In Arizona there have been numerous incidents of weapons and other threats to schools and students.

For example:

- ▶ In April 2024, an elementary school student in Phoenix was found with a gun on a school bus.
- ▶ In September 2024, a school in San Luis was locked down as police investigated reports of shots fired.
- ▶ In December 2024, a middle school student with a gun in their backpack was removed from a classroom in Vail and later arrested.
- ▶ In January 2025, a school in Tucson was locked down as an adult who had entered the school through a delivery gate with a gun and knife was removed from the school.
- ▶ In April 2025, a high school student was arrested for bringing a gun to a school campus in Gilbert.

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<sup>1</sup> Charter schools are public schools established by contracts with statutorily authorized Arizona charter sponsors, such as the Arizona State Board for Charter Schools and the State's 3 public universities, to provide learning that will improve pupil achievement.

<sup>2</sup> See Arizona Auditor General report 24-212 *Arizona School Safety—Emergency Operations Planning*.

<sup>3</sup> Education Week. *School shootings over time: Incidents, injuries, and deaths*. Retrieved 4/16/2025 from <https://www.edweek.org/leadership/school-shootings-over-time-incidents-injuries-and-deaths>

Further, according to the Arizona Counter Terrorism Information Center, it received more than 300 school threats via social media between January 1, 2024 and September 24, 2024.

## **Program established to support, promote, and enhance safe and effective learning environments by funding school safety personnel**

A.R.S. §15-154 establishes the Program within the Department to support, promote, and enhance safe and effective learning environments by providing grant monies to schools for the purpose of placing school safety personnel on school campuses. The Program was originally established in 1994 to support the placement of school resource officers (SROs) and juvenile probation officers on school campuses, and was expanded in 2019 to include school counselors and social workers (see textbox on page 3 for information on these positions and how they contribute to school safety).

The Department's statutory responsibilities related to the Program include:<sup>4</sup>

- ▶ Reviewing schools' Program applications.
- ▶ Visiting school sites to verify information submitted in applications.
- ▶ Distributing grant monies to participating schools that comply with Program requirements.<sup>5</sup>
- ▶ Evaluating and reporting on the Program's effectiveness.<sup>6,7</sup>

The Department is also responsible for selecting schools for participation in the Program based on school safety needs and typically awards grant monies to schools in a 3-year cycle.<sup>8</sup> According to statute, a school may apply to participate in the Program by submitting an application to the Department that includes various information, such as a description of the school's safety needs and a plan for how officers, school counselors, or social workers would be used in the school.<sup>9</sup> The Department selects schools for participation in the Program through a competitive selection process. Selected schools are generally approved to receive Program grant monies for 3 fiscal years, and at the end of the 3 years, schools can reapply to continue participating in the Program. Schools that applied but were not selected for participation in the Program are placed on a waitlist, and if monies become available during the 3-year grant cycle, the Department awards the grant monies to waitlisted schools based on its awarding criteria.<sup>10</sup>

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<sup>4</sup> A.R.S. §15-154.

<sup>5</sup> The Department distributes monies to schools participating in the Program on a reimbursement basis, meaning that schools must first incur expenses on behalf of the Program and then request that the Department reimburse them for those expenses.

<sup>6</sup> Pursuant to A.R.S. §15-154(H), the Department must evaluate and report on the Program's effectiveness. The evaluation and report must include survey results and information from participating schools on the impact of participating in the Program. The Department must submit the report to the Governor, President of the Senate, and Speaker of the House of Representatives by November 1 of each year.

<sup>7</sup> The Department contracts with Arizona State University to survey and collect various information from schools participating in the Program and complete annual evaluations and reports.

<sup>8</sup> The Department's selection of schools for participation in the Program is subject to review and approval by the State Board of Education.

<sup>9</sup> A.R.S. §15-154(B),(C).

<sup>10</sup> According to statute, monies that are not used for an approved Program proposal during the fiscal year for which the monies were appropriated revert back to the Department for distribution in the following fiscal year.

## Program positions support school safety in various ways

### Law enforcement and juvenile probation officers (officers)

These trained officers are intended to deter delinquent and violent behaviors in schools, provide positive role models, teach law-related education classes for students, and consult on schools' emergency response planning, such as developing or updating lockdown procedures.<sup>1</sup> These officers include:

- **SROs:** Certified peace officers assigned to work full-time at a specific school.
- **School safety officers:** Certified peace officers who, instead of working full-time at a specific school, work on an hourly basis at various schools when off duty.
- **Juvenile probation officers:** Court-appointed officers assigned to work full-time at a specific school.

### School counselors and social workers

Department-certified school counselors and social workers can identify students who may be at risk of engaging in harmful behavior or who may be victims of bullying or abuse and provide them with appropriate counseling, support, and referrals to external services if necessary; and provide training to school staff on recognizing signs of distress in students and managing crisis situations.

<sup>1</sup> A.R.S. §15-154(M)(1) defines law-related education as interactive education to provide students with knowledge and skills related to the law, school safety, and effective citizenship.

Source: Auditor General staff review of the Department's Program guidance documents.

See Questions and Answers, Question 6, pages 29 through 30, for more information on the criteria the Department uses to award Program grants.

## Program awards and funding have grown since 2018

As shown in Table 1, page 4, both the number of schools awarded Program grant monies and the number of those placed on the waitlist have grown since 2018. For example, the number of schools awarded Program grant monies more than tripled from 128 in fiscal year 2018 to 424 in fiscal year 2020, which is largely attributable to the Program's expansion to include school counselors and social workers. In fiscal year 2020, the Department also received an increased number of Program applications from schools, resulting in it placing applications from schools to fund 500 school safety positions on the waitlist, including 150 applications for SRO positions and 350 applications for school counselors and social worker positions.

To reduce the number of waitlisted applications, the Legislature increased the Program's State General Fund appropriation by \$50 million annually beginning in fiscal year 2023 and required the Department to prioritize awarding Program monies to schools that had applied for funding for SRO positions but were placed on the waitlist (see pages 9 through 11 for more information

on Program appropriations). After awarding monies for SRO positions to waitlisted schools, the Department could award any remaining monies from the increased appropriation to fund school counselor and social worker positions. For the 3-year grant cycle beginning in fiscal year 2023, the Department awarded Program grant monies for 869 school safety positions, nearly 8 times the number of school safety positions it awarded monies for in fiscal year 2018. Additionally, in December 2024, the Department awarded Program grant monies for an additional 217 school safety positions, resulting in a total of 1,086 funded school safety positions during the cycle.

**Table 1**

**Program funding, applications, and grants awarded for officer, school counselor, and social worker positions increased substantially from fiscal years 2018 through 2025**

	2018	2020 <sup>1</sup>	2023 <sup>1</sup>	2025 <sup>2</sup>
<b>SRO, school safety officer, and juvenile probation officer positions</b>				
Funded positions	113	117	303	498
Schools served	128	131	329	540
<b>Applications</b>				
Received	203	267	303	199
Waitlisted	90	150	0	0
<b>School counselor and social worker positions<sup>3</sup></b>				
Funded positions	NA	266	566	588
Schools served	NA	293	599	613
<b>Applications</b>				
Received	NA	616	857	134
Waitlisted	NA	350	291	70
<b>Totals</b>				
Funded positions	113	383	869	1,086
Schools served	128	424	928	1,153
Total awarded (in millions)	\$12.0	\$32.0	\$84.5	\$128.3

<sup>1</sup> New grants awarded for fiscal years 2020 and 2023 included the last 6 months of the first fiscal year in addition to the following 3 fiscal years.

<sup>2</sup> Because some schools were not able to fill the positions for awards in previous fiscal years, the unused monies were available to the Department to provide awards to other schools in fiscal year 2025. The Department identified nearly \$48 million in unused awards from previous fiscal years and, in December 2024, awarded new grants for the shortened grant cycle of January 2025 through June 2026. The funded positions and schools served for fiscal 2025 include awarded positions and schools served for the 2023 grant cycle and newly awarded positions for the fiscal year 2025 shortened grant cycle. The applications received and waitlisted for fiscal year 2025 reflect the number of applications for the fiscal year 2025 shortened grant cycle.

<sup>3</sup> The Program expanded to include school counselors and social workers in 2019, and the Department awarded the first grants for these positions for fiscal year 2020.

Source: Auditor General staff review of Program award information provided by the Department.

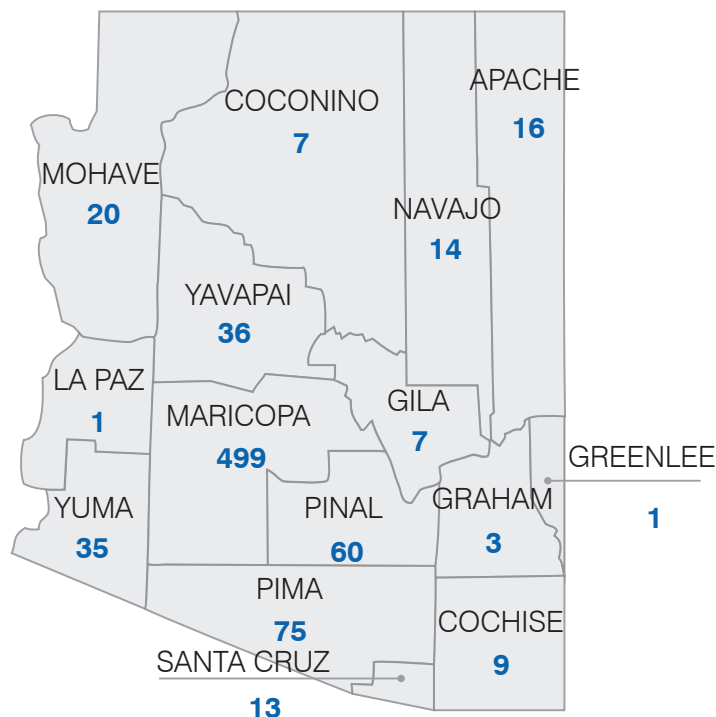
## Department awarded Program grants for school safety positions in all 15 Arizona counties

As shown in Figure 1, the Department awarded Program grants to fund school safety positions to schools in all 15 Arizona counties in fiscal year 2024.

### Figure 1

#### Total number of Program-funded school safety positions in each county<sup>1</sup>

Fiscal year 2024



<sup>1</sup> Program-funded school safety positions include officer, school counselor, and social worker positions.

Source: Auditor General staff review of Program award information provided by the Department.

## Department established various Program requirements intended to enhance school safety personnel effectiveness and improve school safety

The Department adopted a *School Safety Program Manual* that outlines requirements for participating schools that are intended to improve school safety, including:<sup>11</sup>

### ► Developing and monitoring an operational plan that addresses school safety needs and priorities

The Department established required processes and content for participating schools' operational plans to help ensure these schools develop site-specific strategies intended to identify, prioritize, and address safety risks with their available resources; monitor program

<sup>11</sup> Arizona Department of Education (ADE). (2024a). *School safety program manual—SRO/school safety officer, and juvenile probation officer*. Retrieved 9/26/2024 from [https://www.azed.gov/sites/default/files/2023/10/SSP%20FY25%20Manual%20for%20SRO\\_SSO%20%26%20JPO%20schools.pdf](https://www.azed.gov/sites/default/files/2023/10/SSP%20FY25%20Manual%20for%20SRO_SSO%20%26%20JPO%20schools.pdf); Arizona Department of Education (ADE). (2024b). *School safety program manual—Counselor and social worker*. Retrieved 9/26/2024 from <https://www.azed.gov/sites/default/files/2023/10/SSP%20FY24%20%20Manual%20for%20CSWs%20schools.pdf>. See Appendix B, page b-1, for additional information about the Department's *School Safety Program Manual*.

implementation; and review their efforts for effectiveness throughout the year. Specifically, the Department requires schools to:

- **Conduct a safety-needs assessment**

The safety-needs assessment should identify the schools' current school safety interventions and include safety-related data, such as information on student discipline referrals, to review throughout the year for continuous improvement.

- **Determine priority safety areas**

Schools should use the results of the safety-needs assessment to identify 3 priority safety areas, such as substance use, bullying, and student fights.

- **Identify intervention and prevention activities to address priority safety areas**

Schools should identify how they plan to address the 3 priority areas through intervention and prevention efforts, such as providing law-related education to students on the safety risks associated with substance abuse, and increasing officer presence in specific areas with identified safety risks.<sup>12</sup>

- **Implement and monitor the plan**

Once schools identify intervention and prevention activities, they should monitor the progress and effectiveness of these efforts at least quarterly (see page 8 for information on how schools should monitor operational plans).

As discussed in Finding 1, pages 13 through 14, our review of a sample of schools awarded a grant for a school safety position in fiscal years 2022 through 2024 found that most reviewed schools did not develop required operational plans or developed plans that lacked 1 or more required components.

- ▶ **Training school staff on strategies to improve student and campus safety**

School safety personnel, public school administrators, and SROs' law enforcement agency supervisors must participate in initial and/or annual training provided by the Department by the end of each fiscal year on how to carry out their respective roles in a manner that promotes school safety (see textbox on page 7 for more information on these trainings).

As discussed in Finding 1, page 15, our review of a sample of schools awarded a grant for a school safety position in fiscal years 2022 through 2024 found that school personnel at the reviewed schools did not consistently complete the required initial and/or annual training.

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<sup>12</sup> According to A.R.S. §15-154, schools with a Program-funded officer must implement law-related education as a school safety prevention strategy, and the *School Safety Program Manual* requires the use of law-related education to help address priority safety areas.

### Required trainings

School safety personnel, public school administrators, and SROs' law enforcement agency supervisors must complete initial and/or annual training provided by the Department, including:

- **Leadership training:** All new Program participants, including individuals filling a school safety position, school administrators, and SROs' law enforcement agency supervisors, must complete 1 day of either in-person or virtual leadership training on the roles and responsibilities of participants and Program requirements, such as how to conduct school safety needs assessments and develop operational plans.
- **SRO and juvenile probation officer training:** New SROs and juvenile probation officers must complete 4 days of either in-person or virtual training that starts with attending the 1-day leadership training previously mentioned followed by 3 days of training on topics specific to school-based officers, such as child-development and how to deliver law-related education to students. Thereafter, SROs and juvenile probation officers must complete annual training on providing law-related education to students on safety-related topics.
- **School safety officer training:** New school safety officers must complete 8 hours of virtual training on the school safety officer role and responsibilities of the position and other relevant topics, including best practices for school safety. Starting in their second year, school safety officers must complete a half-day interactive or virtual training that includes best practices for teaching law-related education and how to work effectively with Safety Teams.
- **Counselor and social worker training:** New school counselors and social workers must complete 2 days of either in-person or virtual training that starts with the 1-day leadership training previously mentioned followed by 1 day of training on topics specific to school counselors and social workers. Thereafter, school counselors and social workers must annually complete a Program advanced course (see next bullet for more information).
- **Program advanced courses:** After completing initial training, school administrators, SROs' law enforcement agency supervisors, and school counselors and social workers must annually complete an advanced course and can select a course from the Department's Program catalog. Advanced courses are offered in-person and virtually and include topics such as bullying prevention, chronic absenteeism and truancy, and emergency planning.

Source: Auditor General staff review of the Department's Program guidance documents.



► **Establishing a School Safety Assessment and Prevention Team (Safety Team) to facilitate a continuous improvement process**

Each school must establish a Safety Team to facilitate a continuous improvement process by reviewing safety needs; developing, implementing, and monitoring the school's operational plan; determining the use of school safety positions consistent with Program requirements; and coordinating school safety efforts. The Safety Team should meet at least quarterly, and membership must include the school principal or assistant principal, school security staff, school psychologist or school mental/behavioral health expert, and the person filling the officer, counselor, and/or social worker position funded by the Program.

As discussed in Finding 1, pages 15 through 16, our review of a sample of schools awarded a grant for a school safety position in fiscal years 2022 through 2024 found that most reviewed schools either did not establish a Safety Team or established a Safety Team but did not implement some required Safety Team activities.

► **Tracking and submitting staff activity log information to demonstrate school safety personnel are used for their intended purpose of enhancing school safety**

School safety personnel must track their activities, such as the provision of law-related education and hours that school counselors/social workers spend with students. Additionally, schools participating in the Program are required to submit information to the Department, including information on the activities of school safety personnel, and the Department collects this information through an end-of-year survey that captures a summary of the information tracked in the activity logs.

As discussed in Finding 1, page 16, our review of a sample of schools awarded a grant for a school safety position in fiscal years 2022 through 2024 found that reviewed schools did not consistently track activity information for school safety personnel.

Further, according to the Department's policy, schools must submit payment or reimbursement requests to the Department to receive reimbursement for allowable Program expenses, and the Department established various requirements for supporting documentation, such as expenditure reports that schools must submit with their reimbursement requests. For example, in fiscal year 2022, the Department notified schools that they were required to submit expenditure reports to support their reimbursement requests when they drew down more than 50% of their awarded funding. In addition, during fiscal year 2023, the Department began requiring schools awarded a new grant for a school safety position to provide expenditure reports with all reimbursement requests. In fiscal year 2024, the Department expanded this requirement to all schools receiving program monies.

Finally, the Department requires each school to affirm on its Program application that it agrees to comply with Program requirements, including that it read and understands Program guidance and requirements.

As discussed in Finding 1, page 17, we found that the Department did not consistently ensure that schools submitted expenditure reports to verify that the expenses were for the awarded position.

## Organization and staffing

As of June 2025, the Department had 10 filled full-time equivalent (FTE) positions and 2 vacancies in positions assigned to the Program, organized in the following units:

▶ **School safety grants (4 filled FTEs, 2 vacancies)**

Responsible for the Program application review process. Additionally, this unit is responsible for ensuring compliance with some Program requirements, such as ensuring schools awarded monies for a school counselor or social worker position submit applicable Department certifications for personnel filling these positions.

▶ **School safety training (6 filled FTEs)**

Responsible for developing, conducting, and revising Program training, including training on Program requirements and key roles and responsibilities for school safety personnel. This unit is also responsible for working with Arizona State University to survey Program grantees, including gathering feedback on the Program.

## Revenues and expenditures

As seen in Table 2 (see page 10), the Program's revenues primarily consist of State General Fund monies. The Program's expenditures primarily consist of grants awarded to schools and increased annually in fiscal years 2020 through 2024. In fiscal year 2024, Program expenditures totaled more than \$60.4 million, with more than \$53.4 million consisting of grants to schools. Starting in fiscal year 2023, the Legislature appropriated an additional \$50 million annually to the Program, increasing the total authorized annual appropriation for the Program to approximately \$81.5 million (see Table 3, page 11).

Additionally, although not part of the Program, the Department receives federal monies that it uses to provide separate grants to schools for the cost of placing school safety officers on school campuses, and some law enforcement agencies in the State receive federal monies that may be used to support the cost of placing school resource officers on school campuses. See Questions and Answers, Question 3, pages 23 through 26, for more information on federal monies received by the State for additional school safety positions units.

**Table 2****Schedule of revenues and expenditures**

Fiscal years 2020 through 2024

*(Unaudited)*

	2020	2021	2022	2023	2024
<b>Revenues</b>					
<b>State appropriations</b>					
School Safety Program <sup>1</sup>	\$10,451,802	\$26,124,661	\$18,977,843	\$18,430,140	\$52,602,505
School Safety Education Sales Tax <sup>2</sup>	7,800,000	7,800,000	7,800,000	7,800,000	7,800,000
Interest income	3,014	153	12	140	223
<b>Total revenues</b>	<b>\$18,254,816</b>	<b>\$33,924,814</b>	<b>\$26,777,855</b>	<b>\$26,230,280</b>	<b>\$60,402,728</b>
<b>Expenditures</b>					
Grants to schools	\$11,509,493	\$25,208,998	\$27,623,762	\$32,330,176	\$53,432,428
Payroll and related benefits <sup>3</sup>	401,794	548,752	752,005	958,191	968,602
Professional and outside services <sup>4</sup>	294,109	220,672	345,002	376,494	5,761,395
Other operating	146,514	146,240	260,739	365,278	240,080
<b>Total expenditures</b>	<b>\$12,351,910</b>	<b>\$26,124,662</b>	<b>\$28,981,508</b>	<b>\$34,030,139</b>	<b>\$60,402,505</b>
<b>Net change in fund balance</b>	<b>+ \$5,902,906</b>	<b>+ \$7,800,152</b>	<b>- \$2,203,653</b>	<b>- \$7,799,859</b>	<b>+ \$223</b>
(Difference between revenues and expenditures and transfers)					

<sup>1</sup> Revenue for the School Safety Program is reported as the amount of the authorized appropriation that the Department expended in the applicable year (see Table 3, page 11, for the full authorized appropriation amounts). Pursuant to A.R.S. §15-154(J), appropriations to the Department for the Program are exempt from the provisions of A.R.S. §35-190 relating to lapsing of appropriations.

<sup>2</sup> Pursuant to A.R.S. §42-5029.02(A)(6), \$7.8 million of statutorily specified transaction privilege and excise tax monies are annually appropriated for the Program. These monies are transferred to the Department, and any unused monies are carried forward for use in subsequent fiscal years. As mentioned previously, pursuant to A.R.S. §15-154(J), appropriations to the Department for the Program are exempt from the provisions of A.R.S. §35-190 relating to lapsing of appropriations.

<sup>3</sup> According to Department records, payroll and related benefits increased in fiscal years 2022 through 2024 because it hired approximately 4 additional staff to carry out the Program.

## Table 2 continued

<sup>4</sup> In fiscal years 2020 through 2023, professional and outside services primarily consisted of expenses for a third-party contractor to provide training and resources to SROs and juvenile probation officers for teaching law-related education and a contract with Arizona State University to conduct an evaluation of the Program. In fiscal year 2024, professional and outside services expenditures increased because the Department expended approximately \$5.1 million for a third-party contractor to coordinate the placement of off-duty officers on school campuses to work as school safety officers. See Questions and Answers, Question 8, page 32, for more information on this contract.

Source: Auditor General staff analysis of the Arizona Financial Information System/AZ360 Accounting Event Transaction File and the State of Arizona Annual Financial Report for fiscal years 2020 through 2024.

## Table 3

### Schedule of changes in appropriation balances

Fiscal years 2020 through 2024

(Unaudited)

	2020	2021	2022	2023	2024
<b>Beginning appropriation balance<sup>1</sup></b>	<b>\$5,236,646</b>	<b>\$24,829,325</b>	<b>\$30,657,974</b>	<b>\$33,601,666</b>	<b>\$81,564,069</b>
<b>State appropriations</b>					
School Safety Program	\$24,147,000	\$24,150,900	\$24,125,200	\$74,192,543	\$74,192,400
School Safety Education Sales Tax	7,800,000	7,800,000	7,800,000	7,800,000	7,800,000
<b>Total expenditures<sup>2</sup></b>	<b>\$12,351,910</b>	<b>\$26,124,661</b>	<b>\$28,981,508</b>	<b>\$34,030,139</b>	<b>\$60,402,505</b>
<b>Net change in appropriations</b> (Difference between authorized appropriations and expenditures)	<b>+ \$19,595,090</b>	<b>+ \$5,826,238</b>	<b>+ \$2,943,692</b>	<b>+ \$47,962,404</b>	<b>+ \$21,589,895</b>
<b>Ending appropriation balance</b>	<b>24,831,736</b>	<b>30,657,974</b>	<b>33,601,666</b>	<b>81,564,069</b>	<b>103,153,964</b>

<sup>1</sup> Pursuant to A.R.S. §15-154(J), appropriations to the Department for the Program are exempt from the provisions of A.R.S. §35-190 relating to lapsing of appropriations; therefore, any unused amount of the authorized appropriations are carried forward for use in subsequent fiscal years.

<sup>2</sup> The Department expends appropriations for the Program in the order they are appropriated, meaning it expends the oldest remaining appropriations before expending newer appropriations (see Table 2, page 10, for more information on the Department's expenditures).

Source: Auditor General staff analysis of the Arizona Financial Information System/AZ360 Accounting Event Transaction File and the State of Arizona Annual Financial Report for fiscal years 2020 through 2024.

### **Department did not ensure all schools receiving Program monies complied with Program requirements intended to enhance school safety personnel effectiveness and improve school safety**

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#### **Department distributed more than \$1 million of Program monies to schools we reviewed that did not comply with all Program requirements intended to enhance school safety personnel effectiveness and improve school safety**

The Department did not ensure all schools to which it distributed Program monies complied with Program requirements, which could limit these schools' ability to enhance school safety personnel effectiveness and improve school safety. As discussed in the Introduction (see pages 5 through 8), the Department has established various Program requirements intended to improve school safety that schools participating in the Program must follow as a condition of receiving Program monies. For example, participating schools are required to develop an operational plan, ensure school safety personnel and other staff attend annual training, and establish a Safety Team that meets regularly. Additionally, the Department distributes Program monies to schools on a reimbursement basis, and according to A.R.S. §15-154(F), the Department should distribute Program monies to school districts and charter schools that comply with Program requirements.<sup>1</sup>

Additionally, the *Arizona Grants Management Manual* (Grants Manual) requires State agencies, including the Department, to monitor grantees' compliance with grant requirements.<sup>2</sup> This monitoring should include completing annual desk reviews of grantee's financial and programmatic documentation, such as reviewing schools' end-of-year reports and/or survey responses to identify potential noncompliance with grant program requirements, and conducting additional reviews of specific schools or Program areas where noncompliance was found.<sup>3</sup> Additionally, this monitoring should include annually assessing each grantee's risk of noncompliance with program requirements to determine if the Department should provide the grantee with additional training and/or monitoring, such as performing a site visit.<sup>4,5</sup> However, the Department did not conduct some of these monitoring activities, and as discussed below,

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<sup>1</sup> Subsequent to our review, the Legislature modified this requirement to focus on compliance with statutory Program requirements. Specifically, Laws 2025, Ch. 129, §2, revised A.R.S. §15-154 to further specify that the Department should distribute Program monies only to school districts and charter schools in compliance with statutory Program requirements. See Questions and Answers, Question 1, pages 21 through 22, for more information.

<sup>2</sup> Arizona Department of Administration (ADOA). (2018). *Arizona grants management manual*. Retrieved 10/22/2024 from <https://grants.az.gov/grant-manual>

<sup>3</sup> Desk reviews assess a grantee's compliance with program requirements by reviewing the grantee's financial documentation to verify that monies were used for allowable purposes and reviewing programmatic documentation, such as progress reports submitted by grantees with information on the completion of required Program activities, and conducting additional reviews where noncompliance is identified.

<sup>4</sup> Risk assessments should use various factors to determine a grantee's risk of noncompliance, such as the grantee's level of experience with managing grant monies and prior noncompliance with program requirements, such as noncompliance with training requirements.

<sup>5</sup> The Department is required to visit school districts and charter schools to verify information included in applications prior to selecting schools for participation in the Program. However, the Department reported that it does not conduct these site visits.

our review of a sample of 16 participating schools awarded a grant for a school safety position in fiscal years 2022 through 2024 found the Department distributed approximately \$1.1 million of Program monies to 15 of these schools that did not comply with some Program requirements intended to enhance school safety personnel effectiveness and improve school safety.<sup>6</sup>

**Key**

- ✓ Number of reviewed schools that met the requirement.
- ✗ Number of reviewed schools that did not meet the requirement.

**Operational plans**

**Department distributed Program monies to 9 schools that did not develop required operational plans and 2 schools with incomplete operational plans, increasing the risk these schools do not address their most pressing safety needs**

**Operational plans**

11 of 16 schools lacked an operational plan with all required components.



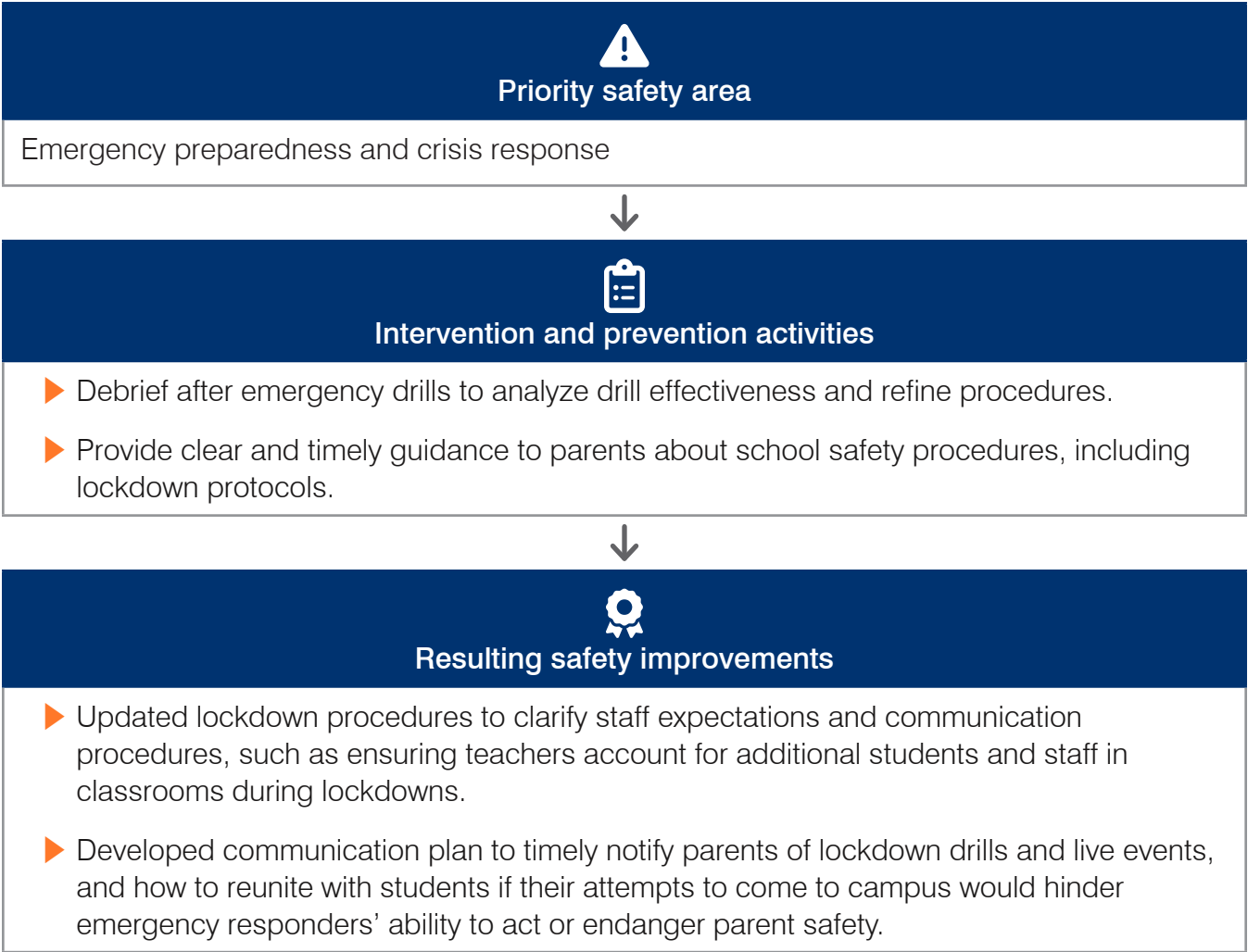
The Department distributed Program monies to some schools that did not meet all operational plan requirements, including:

- ▶ Nine schools that did not develop required operational plans with site-specific strategies intended to help them identify, prioritize, and address safety risks, monitor program implementation, and review their efforts for effectiveness. Absent the operational plans, these schools were at risk of being unaware of and thus unable to prioritize and address their most pressing safety risks. Additionally, without data from the required safety needs assessment or identifying priority focus areas, these 9 schools may not be using the funded school safety positions to their full potential. For example, a preventative measure to address a priority focus on student wellbeing could include SROs engaging with students by teaching classes related to the harms of vaping or regularly monitoring areas identified as frequent locations for student vaping.
- ▶ Two schools with operational plans that lacked some required components, including 1 school that did not include intervention and prevention activities to address high-priority school safety risk areas it had identified, and another school that did not include any priority safety areas and/or associated intervention and prevention activities. Absent these required elements, it is unclear if the SRO or social worker positions funded by Program monies were being used appropriately to provide specific intervention and prevention activities that addressed the schools’ most pressing school safety risks.

<sup>6</sup> We reviewed a random sample of 8 of 330 schools awarded monies for an SRO, juvenile probation officer, or School Security Officer position in fiscal years 2022 through 2024, including 2 schools from urban districts, 2 schools from urban charters, 2 schools from rural districts, and 2 schools from rural charters; and 8 of 605 schools awarded monies for a school counselor or social worker position in fiscal years 2022 through 2024, including 2 schools from urban districts, 2 schools from urban charters, 2 schools from rural districts, and 2 schools from rural charters.

In contrast, as shown in Figure 2, an elementary school that received Program monies for an SRO position that did develop an operational plan with all required components made safety improvements as a result of implementing its operational plan. For example, the school identified emergency preparedness as a high-priority safety risk area, conducted debriefs after emergency drills to analyze drill effectiveness, and made safety improvements resulting from this analysis, including updating its lockdown procedures and developing a communication plan to notify parents about lockdown drills.

**Figure 2**  
**An elementary school with a Program-funded SRO position conducted a safety-needs assessment and identified intervention and prevention activities that resulted in improvements**



Source: Auditor General staff review of Program documentation and related school safety procedures provided by a sampled school.



Training

Department distributed Program monies to 5 schools that did not comply with training requirements, increasing the risk that Program-funded positions were not used effectively to address safety needs

Training

5 of 16 schools had 1 or more personnel that did not complete required training.



The Department distributed Program monies to 5 schools we reviewed that had 1 or more personnel, such as an SRO, school principal, or law enforcement supervisor, who did not complete the Department’s required annual training.

For example:

- ▶ An SRO from 1 school did not complete the required new officer training, which includes instruction and information on child development, trauma responsive practices, working with students with special needs, and SRO expectations.<sup>7</sup> Absent this training, the SRO may not have been prepared to effectively work with students or know the expectations of the position.
- ▶ School administrators from 4 schools did not attend mandatory annual training, including training for school administrators that are new to the Program that outlines how the school safety position activities are connected to school safety.<sup>7</sup> Absent this training, the administrators may not have been prepared to effectively incorporate the Program-funded school safety positions into their school safety efforts and may have been unaware of Program requirements and expectations.

Safety Teams

Department distributed Program monies to 13 schools that did not meet Safety Team requirements, potentially hindering these schools’ efforts to identify and address safety risks

Safety Team

4 of 16 schools did not establish a Safety Team.



Safety Team activities

9 of 12 schools with a Safety Team did not complete some required Safety Team activities.



<sup>7</sup> Our review found that these school personnel did not complete the training within the fiscal year it was required. However, the Department tracks personnel who did not complete training in the prior fiscal year and requires these school safety personnel to attend training in the subsequent fiscal year (see pages 17 through 18 for more information).

The Department distributed Program monies to 13 schools that did not meet Safety Team requirements, including 4 schools that did not establish a Safety Team. Additionally, 9 schools had a Safety Team but did not implement some required Safety Team activities.

For example:

- ▶ 7 schools had Safety Teams, but the teams did not review school safety-needs assessment data or discuss progress addressing priority safety areas.
- ▶ 3 schools had Safety Teams, but the teams did not meet quarterly as required.

By not establishing Safety Teams and completing the required Safety Team activities, these schools may not have identified and made needed school safety improvements.

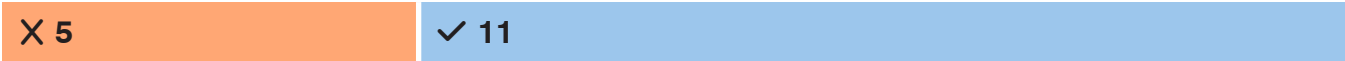
In contrast, all 3 schools we reviewed that established Safety Teams that met at least quarterly as required to discuss safety-needs assessment data and priority safety areas made school safety improvements, such as developing improved lockdown procedures (see Figure 2, page 14, for an example of school safety improvements made by a school we reviewed).

### Activity logs

**Department distributed Program monies to 5 schools that lacked required activity logs, hindering the Department’s ability to ensure school safety personnel are being used for their intended purpose and to evaluate the Program**

#### Activity logs

5 of 16 schools did not have activity logs for school safety personnel.



The Department distributed Program monies to 5 schools that lacked required activity logs for school safety personnel funded with Program monies, increasing the risk that school safety personnel are not being used for their intended purpose of enhancing school safety. For example, school administrators are required to monitor activity logs to ensure school safety personnel are completing required Program activities, and without the required activity logs, school administrators may lack the necessary information to ensure school safety personnel are meeting these requirements. Additionally, schools must include a summary of school safety personnel activity information in the required end-of-year report submitted to the Department. However, schools that lacked an activity log may have reported inaccurate or incomplete school safety personnel activity information in their end-of-year reports. If the Department receives inaccurate or incomplete information from participating schools, it may not be able to accurately evaluate the Program’s efficiency and/or effectiveness because the Department uses the end-of-year report information to evaluate the Program.

# Program expenditure reports

**Although most schools provided expenditure reports, the Department made payments to some schools that did not submit expenditure reports, increasing the risk that Program monies were spent inappropriately**

## Supporting documentation

7 of 59 reimbursement requests lacked supporting documentation for Program expenditures.



Our review of all 59 reimbursement requests schools submitted in fiscal years 2022 through 2024 for those schools required to submit expenditure reports found that the Department reimbursed 2 schools for a total of 7 requests without receiving and reviewing expenditure reports.<sup>8,9</sup> For example, our review of 5 schools’ reimbursement requests submitted in fiscal year 2022 found that 1 school did not submit expenditure reports with its requests. Specifically, the Department reimbursed the 1 school for 6 requests totaling \$43,200 for a school counselor without receiving any expenditure reports from the school that would have provided the specific payment amounts supporting the counselor’s annual salary and benefits, potentially increasing the risk for fraud, theft, waste, and/or abuse. Similarly, our review of 2 schools’ reimbursement requests submitted in fiscal year 2023 found that 1 school did not submit expenditure reports with 1 of their reimbursement requests. Lastly, our review of 6 schools’ reimbursement requests submitted in fiscal year 2024 found that all 6 schools submitted expenditure reports with their reimbursement requests.

# Multiple factors contributed to the Department not ensuring schools complied with Program requirements

**Department did not conduct some monitoring activities and instead relied mainly on schools providing written acknowledgments of compliance with Program requirements**

The Department did not establish some practices consistent with the Grants Manual to monitor schools’ compliance with Program requirements. For example, although the Department had developed some processes for assessing school districts’ financial risk, such as whether a school district submitted its annual budget timely, the Department had not developed a process to assess risk for individual schools’ noncompliance with Program requirements, such as the risk of noncompliance with Safety Team requirements.

Additionally, although the Department had developed a process for reviewing schools’ compliance with initial and/or annual training requirements, the Department did not conduct this review until after the applicable fiscal year had ended, resulting in the Department not identifying school safety personnel who did not comply with initial and/or annual training requirements until the subsequent fiscal year. For example, our review found that some personnel who were new to

<sup>8</sup> The number of reimbursement requests each school made during this time frame ranged between 1 and 10.

<sup>9</sup> Two of 16 schools we reviewed had a school safety officer placed at their school for fiscal year 2024. Because the Department contracted with a third party to coordinate the placement of school safety officers and the Department distributes Program monies for these positions directly to the third-party contractor, these 2 schools did not need to submit reimbursement requests. See Questions and Answers, Question 8, page 32 for more information on the Department’s use of a third-party contractor for coordinating the placement of a school safety officers.

the Program, including school safety personnel and school administrators, had not completed the required initial training until after they completed their first year in the Program, which may have left them unprepared to effectively implement the Program.<sup>10</sup> In fact, 2 school administrators at 1 school did not attend the required initial staff training in fiscal year 2023, their first year in the Program, and instead completed the training in March 2024, approximately 20 months after they began participating in the Program.

Further, the Department did not conduct other monitoring activities that aligned with the Grants Manual, such as site visits and desk reviews, and instead required schools to include an affirmation on their Program applications that they agreed to comply with the Program requirements. The Department also required schools to complete an end-of-year report that includes an affirmation that they met Program requirements but did not require any documentation to corroborate the schools' affirmations. All 15 schools we reviewed that failed to comply with Program requirements had affirmed that they agreed to comply with Program requirements, including that they read and understood the Program guidance and requirements. However, in fiscal year 2025, the Department began developing and implementing policies and procedures for conducting site visits to verify compliance with various Program requirements, such as compliance with operational plan and Safety Team requirements and to provide schools with technical support. In fiscal year 2025, the Department conducted 4 site visits and is developing a plan to conduct additional site visits in fiscal year 2026.

### **Department reported that it reduced some of its monitoring processes for the Program in response to the Program's rapid growth**

According to the Department, it has reduced some of its monitoring processes for the Program in response to the significant increase in the number of awarded school safety positions since fiscal year 2020 (see Introduction, pages 3 through 4, for information on the growth of the Program). For example, the Department reported that prior to the Program expanding in fiscal year 2020, it required schools participating in the Program to submit documentation for review to demonstrate that the school had complied with Program requirements, including requiring schools to submit Safety Team meeting agendas and training certificates for school safety personnel. However, with the Program's expansion, the Department reported it discontinued this requirement to reduce the burden on schools.

### **Department did not provide sufficient guidance for reimbursement requests in fiscal years 2022 and 2023**

In fiscal years 2022 and 2023, the Department lacked sufficient guidance for schools submitting reimbursement requests and for Department staff who review these requests, which may have contributed to the Department making payments to some schools that did not submit expenditure reports. For example, in fiscal year 2022, the Department required schools to submit expenditure reports to support their reimbursement requests when they drew down more than 50% of their awarded funding, but it did not include this requirement in its fiscal year 2022 Program applications. Instead, Department staff reviewing reimbursement requests would notify a school of the requirement when an expenditure report had to be submitted for the school's reimbursement request to be approved.

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<sup>10</sup> Our review found that 4 of the 5 schools that did not comply with the Program's training requirements had personnel who were new to the Program and did not complete all of the required training during their first year.

Additionally, in fiscal year 2023, the Department required schools that applied for a new school safety position to affirm on their Program applications that they agreed to provide expenditure reports with all reimbursement requests; however, it did not include this requirement on its fiscal year 2023 Program application for schools that applied to continue receiving Program monies for a previously awarded position.<sup>11</sup> As a result, in fiscal year 2023, the Department had different requirements for schools requesting reimbursements for a newly awarded school safety position than those requesting reimbursement for a previously awarded position. Further, although schools awarded a grant for a new school safety position were required to submit expenditure reports with all reimbursement requests, it did not include this requirement in its written guidance for staff reviewing reimbursement requests until fiscal year 2024. However, in fiscal year 2024, the Department both updated its guidance for staff reviewing reimbursement requests and required all schools to affirm on their Program applications that they agreed to provide expenditure reports with all reimbursement requests.

## Recommendations to the Department

1. Monitor schools receiving Program monies to ensure they comply with Program requirements, consistent with the Grants Manual, and work with schools to address any identified noncompliance.

Develop and implement written policies and procedures for monitoring schools' compliance with Program requirements consistent with the Grants Manual, including:

2. Conducting risk assessments of each school participating in the Program using various financial and programmatic factors to determine the level of monitoring needed.
3. Completing desk reviews of participating schools' financial and programmatic documentation, such as reviewing schools' end-of-year reports and/or survey responses to identify potential noncompliance with Program requirements, and conducting additional reviews of specific schools or Program areas where noncompliance was found.
4. Conducting site visits, as needed.
5. Continue to review schools' Program reimbursement requests to ensure expenses are supported by expenditure reports, prior to approving the payment.

**Department response:** As outlined in its [response](#), the Department agrees with the finding and will implement the recommendations.

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<sup>11</sup> In fiscal year 2023, schools could apply for a new school safety position as part of a new grant cycle that included the last 6 months of fiscal year 2023 (see Introduction, page 2, for more information on Program grant cycles).

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## Questions and answers

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### Question 1: What legislation enacted in 2025 during the Fifty-seventh Legislature, first regular session, impacted the Program?

During the Fifty-seventh Legislature, first regular session, the Legislature passed and the Governor signed House Bill (HB) 2074, which revised several statutory Program provisions.<sup>1</sup> Specifically, HB 2074 revised statute to:

- ▶ Allow retired law enforcement officers to fill SRO positions.
- ▶ Allow participating schools to use Program grant monies for the purchase of safety technology, training, and infrastructure improvements.
- ▶ Add the following Program requirements:
  - Each school receiving Program monies must develop an emergency operations plan that meets State minimum standards.<sup>2,3</sup>
  - Schools participating in the Program must contract with a school safety assessment provider every 5 years to assess each school's physical security and review its emergency operations plan.
  - The Department must compile a list of approved school safety assessment providers for schools to select from.
  - The Department must select a random sample of schools that are participating in the Program every 3 years and conduct a safety assessment.

As of May 2025, the Department reported that it was working internally to identify the appropriate steps for compiling a list of approved safety assessment providers; and starting with the fiscal year 2027 Program grant cycle, it will require schools to submit emergency operations plans with their Program applications.

Additionally, during the Fifty-seventh Legislature, first regular session, the Legislature passed and the Governor signed Senate Bill (SB) 1287 exempting Public Safety Personnel Retirement

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<sup>1</sup> HB 2074 was chaptered as Laws 2025, Ch. 129, and becomes effective on September 26, 2025.

<sup>2</sup> A.R.S. §15-341(A)(31) requires public schools to develop an emergency operations plan that meets minimum standards developed by the Department and the Arizona Department of Emergency and Military Affairs, and HB 2074 requires that schools comply with this requirement as a condition for receiving Program monies.

<sup>3</sup> Prior to revisions made by HB 2074, statute did not specify that charter schools must develop emergency operations plans; however, pursuant to A.R.S. §15-183(E)(1), charter schools were statutorily required to comply with all laws, rules, and regulations relating to safety. HB 2074 amended A.R.S. §15-183 to specify that charter schools are required to develop emergency operation plans that meet the minimum standards developed by the Department and the Arizona Department of Emergency and Military Affairs.



System (PSPRS) members who are reemployed as an SRO from limitations on receiving pension payments from PSPRS after retiring.<sup>4,5</sup>

## Question 2: Do other states have a competitive grant program similar to Arizona's Program?

We reviewed 8 states—Alabama, California, Colorado, Illinois, New Mexico, Ohio, Texas, and Virginia—to assess if they had a competitive grant program similar to Arizona's Program.<sup>6</sup> As of April 2025, unlike Arizona, none of the 8 states we reviewed had a competitive grant program that provided funding that was specifically required to be used to help pay for the costs of placing school safety positions, such as SROs, school safety officers, school counselors, and school social workers on school campuses.<sup>7</sup>

However, as previously discussed, HB 2074 will now allow participating schools to use Program grant monies to purchase safety technology, training, and infrastructure improvements in addition to paying for school safety positions.<sup>8</sup> These changes more closely aligned Arizona's Program with some other states we reviewed. Specifically, most of the states we reviewed provide state funding that can be used to help pay for school safety and mental health programs or related purposes, and some states provided state funding that can be used to help pay for school safety positions, as follows:

- ▶ 2 of 8 states we reviewed—Colorado and Virginia—provide competitive state funding that can be used for various purposes related to school safety, including but not limited to supporting the cost of placing SROs on school campuses.<sup>9,10</sup>
- ▶ 2 of 8 states we reviewed—New Mexico and Texas—provide noncompetitive state funding that can be used for various purposes related to school safety, including but not limited to supporting the cost of placing SROs on school campuses.
- ▶ 4 of 8 states we reviewed—Alabama, California, Illinois, and Ohio—do not provide state funding related to school safety for placing SROs on school campuses.

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<sup>4</sup> SB 1287 was chaptered as Laws 2025, Ch. 183.

<sup>5</sup> Prior to revisions made to statute by SB 1287, A.R.S. §38-849 stated that if a PSPRS member is reemployed by the employer from which they retired in any capacity within 6 months after their retirement date or in the same position at any time following retirement, their retirement benefits must be suspended during employment.

<sup>6</sup> The 8 states we reviewed included 3 neighboring states, 3 states with standalone school safety entities, and 2 states recommended for review by school resource officer stakeholders.

<sup>7</sup> We considered competitive grants as those grants in which applicants are evaluated against each other based on established criteria to determine which applicants receive the awards, and noncompetitive grants as those grants in which applicants are not evaluated against each other to determine awards.

<sup>8</sup> HB 2074 revised A.R.S. §15-154. See Questions and Answers, Question 1, page 21, for more information on legislation enacted in 2025 during the Fifty-seventh Legislature, first regular session, related to the Program.

<sup>9</sup> Although Arizona schools can use Program grant monies to help pay for the costs of placing SROs and school safety officers on school campuses (see Introduction, page 3, for more information on these officer positions), we found that all 8 other states we reviewed referred to law enforcement officers placed on school campuses as SROs.

<sup>10</sup> Virginia provides both competitive and noncompetitive state funding that can be used to pay for placing SROs on school campuses or other safety purposes.

- ▶ 1 of 8 states we reviewed—Ohio—provides noncompetitive state funding that can be used for various purposes related to mental health and/or social wellness, including but not limited to supporting the cost of placing school counselors and social workers on school campuses.
- ▶ 1 of 8 states we reviewed—Colorado—provides competitive state funding that can be used for various purposes related to mental health and/or social wellness, including but not limited to supporting the cost of placing school counselors and social workers on school campuses.
- ▶ 6 of 8 states we reviewed—Alabama, California, Illinois, New Mexico, Texas, and Virginia—do not provide state funding related to mental health and/or social wellness for placing school counselor and social workers on school campuses.

See Table 4, page 24, for a detailed comparison of Arizona’s and the 8 other states’ practices and requirements for placing officers on school campuses, and Table 5, page 25, for a detailed comparison of Arizona’s and the 8 other states’ practices and requirements for placing school counselors and social workers on school campuses.

### **Question 3: How do Arizona’s practices and requirements for placing school safety positions, including officers, school counselors, and school social workers, on school campuses compare to the other states we reviewed?**

We identified several key similarities between Arizona’s practices and requirements for placing school safety positions on school campuses with the 8 other states we reviewed, and HB 2074 made statutory changes to the Program that further aligned Arizona’s practices with some other states’ practices (see Table 4, page 24, for a detailed comparison of Arizona’s and the 8 other states’ practices and requirements for placing officers on school campuses, and Table 5, page 26, for a detailed comparison of Arizona’s and the 8 other states’ practices and requirements for placing school counselors and social workers on school campuses).

#### **Key similarities between Arizona and the 8 other states we reviewed, including how HB 2074 further aligned Arizona with other states**

- ▶ Arizona and all 8 other states require SROs to be certified peace officers.
- ▶ Arizona and all 8 other states received federal monies that may be used to help pay the costs of placing SROs on school campuses.
- ▶ Arizona and 4 other states received federal monies that may be used to support the cost of placing school counselors or social workers on school campuses.
- ▶ As of May 2025, Arizona and all 8 other states have statutory training requirements for SROs. Prior to statutory revisions made by HB 2074, there was no statutory training requirement for SROs in Arizona; however, HB 2074 added the requirement for school districts and charter schools to train officers working on school campuses to recognize and effectively interact with children with disabilities.

**Table 4<sup>1</sup>****Some other states' practices and requirements for placing school resource officers (SROs) on school campuses are like Arizona's**As of May 2025<sup>2</sup>

State	State funding that may be used for SROs?	State funding that may be used for SROs is competitive, noncompetitive, or both? <sup>3</sup>	Amount of federal grant monies received that may be used for SROs <sup>4</sup>	SROs required to be peace officer? <sup>5</sup>	Statutory SRO training requirement
Arizona <sup>6</sup>	Yes	Competitive	\$27,326,927	Yes	<b>Specialized training regarding students with disabilities</b>
Alabama	No <sup>7</sup>	-	16,215,383	Yes	Active shooter training and firearm requalification
California	No <sup>7</sup>	-	134,309,811	Yes	64 hours of specialized SRO training
Colorado	Yes	Competitive	10,606,572	Yes	Specialized SRO training
Illinois	No	-	49,065,145	Yes	40 hours of specialized SRO training
New Mexico	Yes	Noncompetitive	13,934,976	Yes	Specialized SRO training
Ohio	No <sup>7</sup>	-	48,805,769	Yes	40 hours of specialized SRO training
Texas	Yes	Noncompetitive	107,419,414	Yes	16 hours of specialized SRO training and active shooter response training
Virginia	Yes	Both	\$18,121,895	Yes	Specialized SRO training

<sup>1</sup> We identified key state and federal funding for school safety positions in other states. However, there may be additional funding used in other states for the cost of placing school safety positions on school campuses that we did not review, such as funding provided by local governments.

<sup>2</sup> The Governor signed HB 2074 in May 2025. This table shows how Arizona will compare to other states once HB 2074 becomes effective.

<sup>3</sup> State funding for school safety positions that we identified included both competitive funding, meaning that monies are awarded through a competitive selection process, and noncompetitive funding, meaning that monies are allocated based on established formulas that consider factors such as student enrollment or number of students from low-income families.

# Table 4 continued

- <sup>4</sup> The most recent information available for federal grants that may be used for SROs is from fiscal years 2022 and 2024 grants. The information provided is for the federal Bipartisan Safer Communities Act’s Stronger Connections Grant, which allocated one-time funding to state educational agencies in 2022 and U.S. Department of Justice, Office of Community Oriented Policing Services (COPS), and COPS Hiring Program 2024 grant awards.
- <sup>5</sup> We used the term peace officer to define an officer as having the responsibility for law enforcement.
- <sup>6</sup> Prior to statutory revisions made by HB 2074, the Program provided to schools dedicated State grant monies that were specifically required to be used to place officers, school counselors, and social workers on school campuses. However, HB 2074 revised statute to allow schools to use Program grant monies for additional purposes.
- <sup>7</sup> Although these states provide funding that can be used for other purposes related to school safety, the funding cannot be used for placing school resource officers in schools..

Source: Auditor General staff review of HB 2074; Arizona, Alabama, California, Colorado, Illinois, New Mexico, Ohio, Texas, and Virginia state statutes and school safety websites; federal grant program websites; and interviews with state agency staff in Arizona, Colorado, Illinois, Ohio, Texas, and Virginia.

# Table 5<sup>1</sup>

## Some other states’ practices and requirements for school counselors and school social workers (CSWs) on school campuses are like Arizona’s

As of May 2025<sup>2</sup>

State	State funding that may be used for CSWs?	State funding that may be used for CSWs is competitive, noncompetitive, or both?	Amount of federal grants received that may be used for CSWs <sup>3</sup>	School counselor requirements <sup>4</sup>	Social worker requirements <sup>4</sup>
Arizona <sup>5</sup>	Yes	Competitive	\$353,789	State certificate	State certificate
Alabama	No	-	2,998,164	State certificate	State license
California	No <sup>6</sup>	-	6,538,548	State credential	State credential
Colorado	Yes	Competitive	1,500,000	State license	State license
Illinois	No	-	-	State license	State license
New Mexico	No	-	-	State license	State license
Ohio	Yes	Noncompetitive	-	State license	State license
Texas	No	-	-	State certificate	State license
Virginia	No <sup>6</sup>	-	\$346,689	State license	State license

- <sup>1</sup> We identified key state and federal funding for school safety positions in other states. However, there may be additional funding used in other states for the cost of placing school safety positions on school campuses that we did not review, such as funding provided by local governments.
- <sup>2</sup> HB 2074 was signed by the Governor in May 2025. This table shows how Arizona will compare to other states once HB 2074 becomes effective.

## Table 5 continued

- <sup>3</sup> The information provided for federal grants that may be used for CSWs is for fiscal year 2024, the most recent awarded information for the Stronger Connections Technical Assistance and Capacity Building Program, Mental Health Services and Professional Demonstration Grant Program, and Project AWARE (Advancing Wellness and Resiliency in Education), and the School-Based Mental Health Services Grant Program, which allocated its most recent awards to state educational agencies in 2024.
- <sup>4</sup> Our review found that school counselor and social worker requirements varied across states, with state licenses having a higher level of qualification requirements than state credentials, and state certificates having the least qualification requirements.
- <sup>5</sup> Prior to statutory revisions made by HB 2074, the Program provided dedicated State grant monies to schools that were specifically required to be used to place officers and school counselors and social workers on school campuses. However, HB 2074 revised statute to allow schools to use Program grant monies for additional purposes.
- <sup>6</sup> These states provide funding that can be used for mental health and/or social wellness programs, but this funding cannot be used for placing school counselors and/or social workers in schools.

Source: Auditor General staff review of HB 2074; Arizona, Alabama, California, Colorado, Illinois, New Mexico, Ohio, Texas, and Virginia state statutes and school safety websites; federal grant program websites; as well as interviews with state agency staff in Arizona, Colorado, Illinois, Ohio, Texas, and Virginia..

- ▶ As of May 2025, Arizona and 7 of 8 other states provide state funding that may be used to pay for school safety-related costs, including placing SROs on campuses, updating safety-related infrastructure, and installing silent alarms. Prior to statutory revisions made by HB 2074, Arizona, unlike other states, provided dedicated State grant monies to schools that were specifically required to be used only to place officers, school counselors, and social workers on school campuses. However, statute was revised to now allow schools to use Program grant monies more broadly for additional school safety-related purposes.
- ▶ As of May 2025, Arizona and 4 of 8 other states provide state funding to pay for school-based mental health programs and services, such as placing school counselors and social workers on school campuses and training for school staff.

## Question 4: What additional efforts has the Department implemented to improve school safety in Arizona?

The Department's Division of School Safety and Social Wellness administers the Program and provides other school safety-related resources for public schools through various efforts, including:<sup>11</sup>

### ▶ School Preparedness team

Provides resources and training to schools for developing and updating emergency operations plans, including providing templates and a self-assessment checklist for schools to use when developing and reviewing their emergency operations plans (see textbox on page 27 for the definition of an emergency operations plan). Each school is statutorily required to have an emergency operations plan that meets minimum standards developed by the Department and the Arizona Department of Emergency and Military Affairs.<sup>12</sup> For more information on emergency operations plans, see our 2024 school safety

<sup>11</sup> The Department's Division of School Safety and Social Wellness had 18 FTEs, including 12 FTEs assigned to the Program and 6 FTEs assigned to other division school safety efforts.

<sup>12</sup> A.R.S. §15- 341(A)(31).

special audit report on emergency operations planning.<sup>13</sup>

► **Project AWARE (Advancing Wellness and Resiliency in Education)**

Provides professional development and technical assistance to schools on suicide prevention, understanding mental health disorders, and school and community mental health partnerships.

► **School Nursing and Health Services**

Provides resources and training for school nurses, including virtual training on emergency preparedness for nurses, and places nurses in schools in rural and underserved communities.

## Emergency operations plan

A documented plan that provides guidance and procedures for school personnel to follow when responding to a school safety emergency.

Source: Auditor General staff review of Federal School Safety Clearinghouse. (n.d.). *Foundational elements of school safety*. Retrieved 4/18/2025 from <https://www.schoolsafety.gov/foundational-elements-school-safety>

## Question 5: What are some similar efforts to improve school safety that other states we reviewed have implemented?

The 8 other states' school safety efforts we identified generally focus on crisis and emergency prevention, preparation, and response, but the specific statutory provisions and requirements related to these efforts vary from state to state.

### California

The California Department of Education's School Health and Safety Office (Office) provides resources for schools, such as best practices for crisis preparedness, training information, and technical assistance to establish a safe learning environment. For example, California Education Code §32281 requires schools to develop an emergency operations plan, and the Office provides guidance for school personnel for developing and updating emergency operations plans. These efforts include providing a compliance tool designed to assist schools with developing emergency operations plans that include all required and recommended components, such as earthquake emergency procedures and drills. Further, California Education Code §38000 allows school districts to establish school police departments and employ police officers or contract with local law enforcement agencies to help ensure school safety.

### Colorado

The Colorado Department of Public Safety's Office of School Safety has 3 units to support schools: (1) the School Resource Center for providing resources to schools and local agencies, such as in-person and virtual training and technical assistance to foster safe learning environments, (2) the Crisis Unit for providing crisis response training to school administrators, mental health professionals, and educators and providing mental health professionals to assist

<sup>13</sup> See Arizona Auditor General report 24-212 *Arizona School Safety—Emergency Operations Planning*.

in the aftermath of a critical incident, and (3) the Grants Unit for administering state and federal school safety grants. For example, Colorado Revised Statute 22-32-109.1 requires schools to develop an emergency operations plan, and the Colorado Department of Public Safety's Office of School Safety provides various resources to assist schools with their planning efforts, including an emergency operations plan template and checklist.

## Illinois

The Illinois School and Campus Safety Resource Center provides resources for schools, including guidance for crisis preparedness and training, such as training on assessing and responding to threats of violence on school campuses.<sup>14</sup> The Illinois State Board of Education also provides school safety resources for schools, including a template for documenting the completion of all required safety drills. Additionally, according to Illinois Compiled Statutes 105 ILCS 128/25, schools must annually review and update school emergency operations plans with first responders and conduct safety drills, and the Illinois State Board of Education provides emergency operations plan guidance and a checklist for schools to use when conducting annual emergency operations plan reviews.<sup>15</sup> Additionally, the Illinois Emergency Management Agency provides a confidential hotline for students to share information that might help prevent suicides, bullying, and school violence.

## New Mexico

The Safe Schools Program within the New Mexico Public Education Department provides various school safety resources for schools, including guidance and training on preventing bullying and templates for communicating with parents during an emergency. Additionally, the Safe Schools Program provides resources to schools for developing and updating required emergency operations plans, including providing templates, training, and a rubric for schools to use when developing and reviewing their emergency operations plans.<sup>16</sup> Further, New Mexico Administrative Code § 6.12.6.8 requires schools to submit their plans to the New Mexico Department of Public Education for review every 3 years.

## Ohio

The Ohio Department of Public Safety houses the School Safety Center, which is responsible for assisting schools and first responders with prevention, preparation, and response to threats of violence. The Ohio School Safety Center provides resources, including guidance and training for assisting Ohio schools to comply with Ohio Revised Code § 5502.262, which requires schools to develop emergency operations plans. Additionally, schools are required to update their emergency operations plan at least every 3 years.<sup>17</sup> The Ohio School Safety Center also offers a school tip line for students to anonymously report threats to student safety.

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<sup>14</sup> The Illinois School and Campus Safety Resource Center is administered by the Illinois Law Enforcement Training and Standards Board Executive Institute at Western Illinois University.

<sup>15</sup> Illinois Compiled Statutes 105 ILCS 128/25 refers to emergency operations plans as school emergency and crisis response plans.

<sup>16</sup> N.M. Admin. Code § 6.12.6.8.

<sup>17</sup> Ohio Admin. Code § 4501:5-1-01.



## Texas

The Texas School Safety Center, a university research center for school safety at Texas State University, conducts research and provides training and technical support for schools throughout Texas. The Texas School Safety Center also provides resources and training to help schools maintain compliance with developing statutorily required emergency operations plans.<sup>18</sup>

Additionally, the Texas Education Agency's Safe and Supportive Schools Program offers resources for schools to help address behavioral and mental wellness, including guidance for developing behavioral threat assessment procedures. The Safe and Supportive Schools Program also offers reviews of threat assessments, training modules, and a mental health resource database for school personnel and stakeholders. The Texas Education Agency also provides a data-reporting system and repository for schools to submit and store safety and security-related information, including emergency operations plans and reports on completed threat assessments.<sup>19</sup>

Further, according to the Texas Education Code, all public schools are required to provide each classroom with silent panic alarms that allow for immediate contact with emergency services, effective beginning with the 2025–2026 school year.<sup>20</sup> Finally, the Texas Code of Education allows school districts to establish school district police departments. The chief of police for a school district police department is responsible for supervising police officers employed by the school district and reports to the school district's superintendent.<sup>21</sup>

## Virginia

The Virginia Center for School and Campus Safety, located within the Virginia Department of Criminal Justice Services, was statutorily established to serve as a resource for schools by providing guidance, training, and technical assistance on school safety, including providing resources for developing statutorily required emergency operations plans.<sup>22</sup> The Virginia Center for School and Campus Safety is also required to develop annual school safety audits that schools must complete, which include various survey and self-assessment components, such as assessments of school buildings to identify physical safety concerns.<sup>23</sup> Additionally, the Virginia Center for School and Campus Safety provides training to satisfy SRO minimum training requirements and helps develop a model memorandum of understanding for local school boards and law-enforcement agencies regarding the use of SROs.

## Question 6: What criteria does the Department use when awarding Program grants to schools?

Statute requires the Department to use relevant crime statistics when assessing the safety needs of each school applying for a Program grant for an SRO or juvenile probation officer position and

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<sup>18</sup> Tex. Educ. Code §37-108.

<sup>19</sup> Tex. Educ. Code §37.108.

<sup>20</sup> Tex. Educ. Code §37.117.

<sup>21</sup> Tex. Educ. Code §37.081.

<sup>22</sup> Va. Code §§9.1-184 and 22.1-279.8.

<sup>23</sup> Va. Code §22.1-279.8.

to use academic and social emotional data when assessing the safety needs for each school applying for a Program grant for a counselor or social worker position.<sup>24</sup> Additionally, during its 2020, 2023, and 2025 grant cycles, the Department developed and used additional criteria to assess school safety needs for each school that submitted an application, such as prioritizing schools with high chronic absenteeism or dropout rates or low graduation rates in relation to the rest of the State.<sup>25</sup> Table 6, page 31, shows the Department's criteria for assessing schools' Program applications for each competitive grant cycle from 2020 through 2025.

## **Question 7: What outreach has the Department conducted to inform schools about the Program?**

The Department conducts various outreach activities to inform potential and current grantees about the Program, including:

- ▶ **Sending emails to school districts and charter schools and providing webinars to share information on new Program funding opportunities and the application process**

The Department sends emails to school district and charter school administrators to provide information on new Program funding opportunities. These emails include information on the Program and amount of available grant monies as well as information on upcoming webinars that potential grantees can attend to learn more about the new Program funding opportunity, including the application process and Program requirements. For example, in October 2024, the Department hosted 2 informational webinars for potential grantees to learn about the Program grant available for fiscal year 2025. During the webinars, the Department shared information on the positions that can be funded through the Program, Program requirements, how to submit an application, and how schools would be prioritized for awards. According to the Department, a total of approximately 130 participants attended the 2 webinars, and the Department subsequently made a recording of the webinar available on its website 11 days after the first training.

- ▶ **Sending emails to grantee schools about Program updates and requirements and upcoming trainings**

The Department sends emails to schools participating in the Program regarding various aspects of the Program, such as Program updates, upcoming trainings, and/or reminders of Program requirements.

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<sup>24</sup> A.R.S. §15-154(D),(H).

<sup>25</sup> The Department includes the criteria in a solicitation that indicates what the grant monies may be used for.

**Table 6****Department used various selection criteria for awarding grants in its 2020 through 2025 grant cycles**

<b>Awarding criteria</b>	<b>Officer</b>			<b>School counselor or social worker</b>		
	<b>2020</b>	<b>2023<sup>1</sup></b>	<b>2025</b>	<b>2020</b>	<b>2023<sup>1</sup></b>	<b>2025</b>
Low ratio of officers or school counselors and social workers to enrolled students <sup>2</sup>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural school district or charter school	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
School districts and charter schools with less than 500 enrolled students	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Compliance with training requirements <sup>3</sup>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
School without an officer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
School without a school counselor or social worker	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
High chronic absenteeism or dropout rate or low graduation rate in relation to the rest of the State	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
High percentage of homeless, foster care, or refugee students in relation to the rest of the State	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gun incident on campus in prior fiscal year	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High county juvenile crime rate in relation to the rest of the State	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Targeted support and improvement school <sup>4</sup>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



Used as selection criteria for awarding grants in the specified year



Not used as selection criteria for awarding grants in the specified year

**Table 6 continued**

- <sup>1</sup> As discussed in the Introduction, for fiscal year 2023, the Legislature appropriated an additional \$50 million to the Department for the Program with the requirement that the Department first use the monies to fund SRO positions for schools on the waitlist. Thereafter, the Department could use the remaining monies for school counselor and social worker positions.
- <sup>2</sup> Low ratio of officers, school counselors, or social workers to enrolled students includes schools requesting monies for an officer position that had fewer than 1 officer to every 1,200 students, and schools requesting monies for a school counselor or social worker position that had fewer than 1 school counselor or social worker to every 500 elementary school students or 400 high school students.
- <sup>3</sup> Compliance with training requirements includes schools that participated in the prior grant cycle that complied with Program training requirements.
- <sup>4</sup> The federal Every Student Succeeds Act requires the Department to identify schools that have consistently underperforming student subgroups, such as students with disabilities, English learners, or economically disadvantaged students for targeted support and improvement.

Source: Auditor General staff review of Program application scoring rubrics and guidance documentation provided by the Department.

**► Hosting monthly meetings to provide technical support and resources to grantees**

The Department hosts monthly virtual meetings to provide technical support and share resources with Program grantees, including providing tips for using the Department’s Program templates, such as templates for Safety Team agendas (see Introduction, page 8, for information on Safety Teams). Additionally, the Department invites guest speakers from other State agencies and professional organizations who provide updates on school safety-related initiatives, such as sharing information on Arizona’s State-wide behavioral health crisis hotline and services. According to the Department, attendance at the monthly meetings ranged from 9 to 129 participants in calendar year 2024.

**Question 8: What has the Department done to help schools participating in the Program fill officer positions?**

In 2023, the State Superintendent of Public Instruction convened the School Safety Task Force to provide input on the Program.<sup>26</sup> The School Safety Task Force made various recommendations for the Program, including recommending a statutory change to allow retired peace officers to fill SRO positions. The School Safety Task Force’s recommendations were included in a legislative bill in 2024 and again in 2025 (see pages 21 through 22 for additional information on legislative changes related to the Program).<sup>27</sup>

In 2023, the Department also contracted with a third party to coordinate the placement of off-duty officers on school campuses to work as school safety officers (see Introduction, page 3, for more information about school safety officers). Schools that receive a Program grant for an SRO but are not able to obtain an officer from a local law enforcement agency to work full-time at their school can opt for the placement of a school safety officer. For fiscal year 2024, 86 schools used the third-party contractor to coordinate the placement of a school safety officer.<sup>28</sup>

<sup>26</sup> The School Safety Task Force comprised stakeholders from law enforcement agencies, representatives from school districts and charter schools, and elected officials.

<sup>27</sup> In 2024, the Fifty-sixth Legislature, second regular session, introduced HB 2400 with the School Safety Task Force recommendations, but the bill was held in the Senate. In 2025, during the Fifty-seventh Legislature, first regular session, HB 2074 was enacted, which included most of the School Safety Task Force recommendations. See Question 1, page 21, for more information on HB 2074.

<sup>28</sup> Schools that decide to have school safety officers must work with the third-party contractor to schedule when they would like to have a school safety officer on campus. The school safety officers must then sign up to work at the school during that time.

The Arizona Auditor General makes 5 recommendations to the Department

Click on a finding, recommendation, or its page number to the right to go directly to that finding or recommendation in the report.

Recommendations to the Department

<b>FINDING 1</b>	<b>12</b>
1. Monitor schools receiving Program monies to ensure they comply with Program requirements, consistent with the Grants Manual, and work with schools to address any identified noncompliance.	19
Develop and implement written policies and procedures for monitoring schools' compliance with Program requirements consistent with the Grants Manual, including:	
2. Conducting risk assessments of each school participating in the Program using various financial and programmatic factors to determine the level of monitoring needed.	19
3. Completing desk reviews of participating schools' financial and programmatic documentation, such as reviewing schools' end-of-year reports and/or survey responses to identify potential noncompliance with Program requirements, and conducting additional reviews of specific schools or Program areas where noncompliance was found.	19
4. Conducting site visits, as needed.	19
5. Continue to review schools' Program reimbursement requests to ensure expenses are supported by expenditure reports, prior to approving the payment.	19

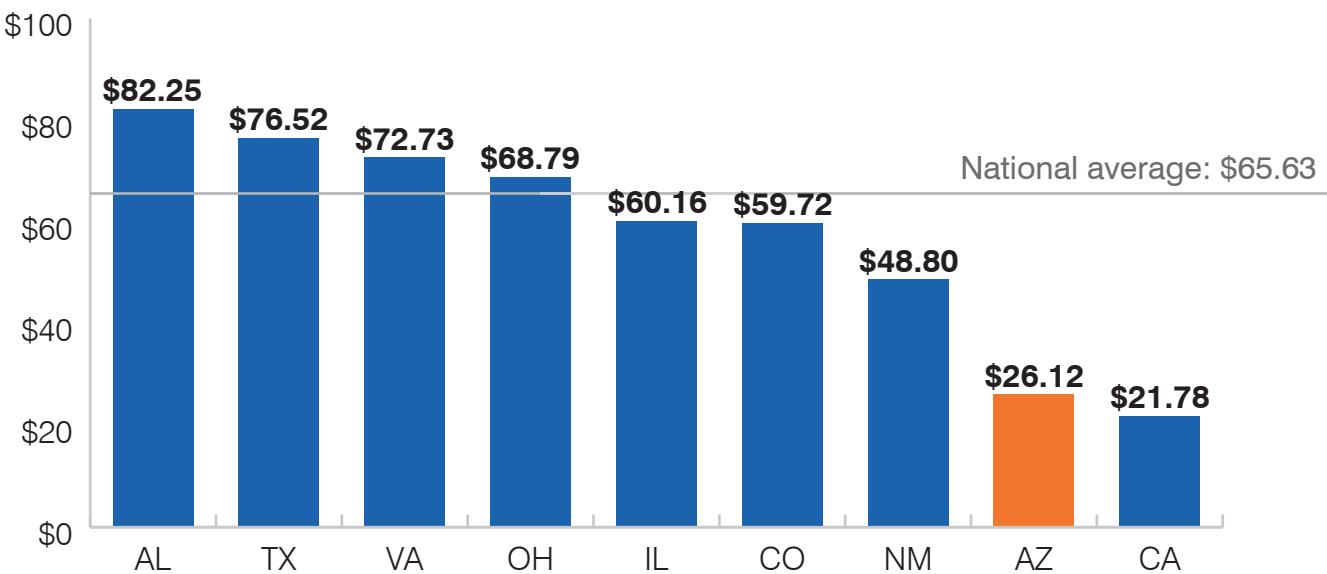
# Arizona and other state per student spending for school safety personnel

This appendix provides estimated per student spending for the 2021-2022 school year, which is the latest data available, for school safety personnel, including SROs, school counselors, and social workers for Arizona and 8 other states—Alabama, California, Colorado, Illinois, New Mexico, Ohio, Texas, and Virginia.<sup>1</sup> As seen in Figure 3, estimated per student spending for SROs varied greatly across states we reviewed, ranging from \$21.78 in California to \$82.25 in Alabama. In Arizona, the estimated per student spending for SROs was \$26.12.

Similarly, the estimated per student spending for school counselors and social workers varied greatly, ranging from \$157.50 in Arizona to \$393 in Virginia for school counselors, and from \$9.48 in Texas to \$200.93 in Illinois for social workers (see Figure 4, page a-2 and Figure 5, page a-2). In Arizona, the estimated per student spending for social workers was \$36.37.

For the 2021-2022 school year, Arizona was below the national average for estimated per student spending for SROs, school counselors, and social workers.<sup>1</sup>

**Figure 3**  
**For the 2021-2022 school year, Arizona and 4 other states we reviewed were below the national average for estimated per student spending for SROs**

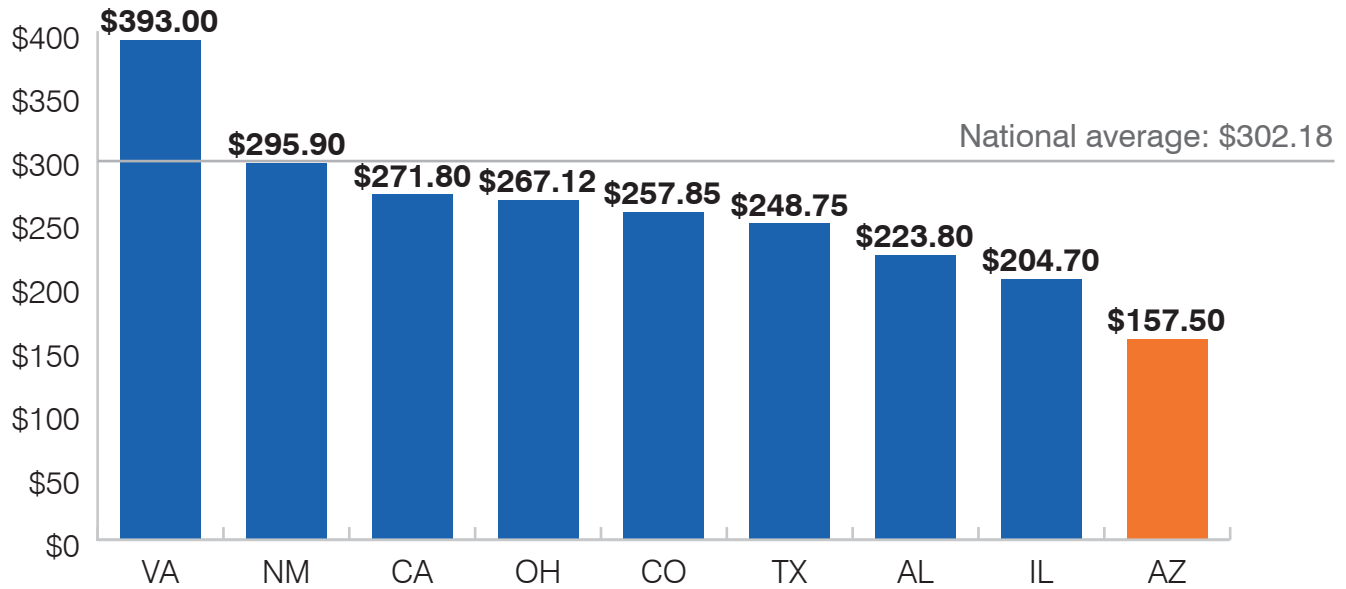


Source: Auditor General staff calculations using data from the U.S. Department of Education’s Civil Rights Data Collection for years 2020-2021 & 2021-2022 and 2022 Bureau of Labor Statistics Occupational Employment and Wage Statistics.

<sup>1</sup> To provide estimated per student spending for school safety personnel across Arizona and 8 other states and the national average using all 50 States and the District of Columbia, we used state-level occupational wage data, student enrollment data, and survey data of school support personnel collected by the U.S. Bureau of Labor Statistics (U.S. BLS) and U.S. Department of Education (U.S. DOE). The time periods this data covers do not perfectly correspond because they are either collected at different intervals (e.g., not every year) and/or are not yet available. We first combined the latest available U.S. DOE survey data on school resource officers, school counselors, and social workers for the 2021-2022 school year with occupational wage data from the U.S. BLS for calendar year 2022 to calculate the total cost of school safety personnel for each state. Then, we used the latest available state-level student enrollment data for the 2020-2021 school year collected by the U.S. DOE to calculate expenditures per student for each type of school safety position, to allow for relative comparisons across states. To estimate the national average of per student spending on school safety personnel, the estimated spending for each state and the District of Columbia were totaled and divided by 51.

**Figure 4**

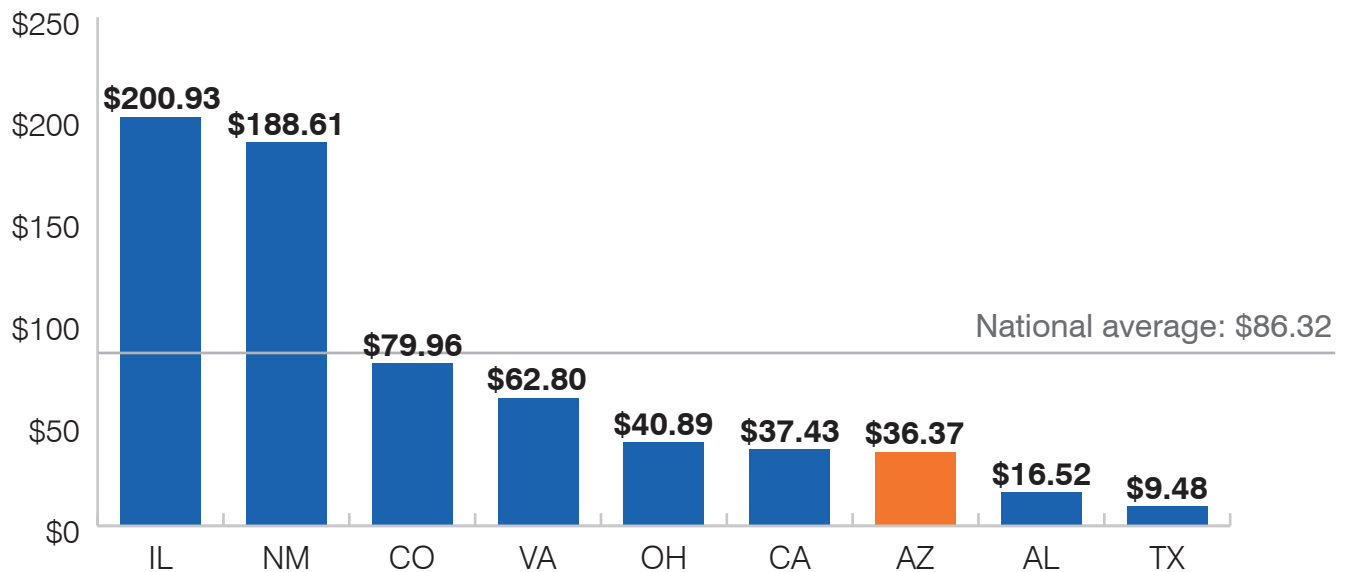
**For the 2021-2022 school year, Arizona and 7 other states we reviewed were below the national average for estimated per student spending for school counselors**



Source: Auditor General staff calculations using data from the U.S. Department of Education's Civil Rights Data Collection for years 2020-2021 & 2021-2022 and 2022 Bureau of Labor Statistics Occupational Employment and Wage Statistics.

**Figure 5**

**For the 2021-2022 school year, Arizona and 6 other states we reviewed were below the national average for estimated per student spending for social workers**



Source: Auditor General staff calculations using data from the U.S. Department of Education's Civil Rights Data Collection for years 2020-2021 & 2021-2022 and 2022 Bureau of Labor Statistics Occupational Employment and Wage Statistics.



## Scope and methodology

The Arizona Auditor General conducted this performance audit of the Department's Program pursuant to a November 21, 2022, resolution of the Joint Legislative Audit Committee and A.R.S. §41-2958 and A.R.S. §15-154(L).

We used various methods to address the audit objectives, including reviewing applicable State statutes; the Department's website, policies, and other written guidance, such as the *School Safety Program Manual*; and interviewing Department staff. Additionally, we used the following specific methods to meet the audit objectives:

- ▶ To assess whether the Department ensured schools that received Program grant monies complied with Program requirements, as required by statute, we reviewed:
  - Program requirements for participating schools outlined in the Department's *School Safety Program Manual*.<sup>1,2</sup>
  - Grant-monitoring requirements for State agencies outlined in the *Arizona Grants Management Manual* and Department grant guidance documents.<sup>3</sup>
  - Program documentation for a random sample of 16 schools awarded a Program grant for a school safety position in fiscal years 2022 through 2024.<sup>4</sup> Program documentation we reviewed included sampled schools' Program grant applications, training records, and documentation provided by each school, such as operational plans, Safety Team meeting agendas, activity logs, and policies and procedures.
  - All 59 reimbursement requests the Department received from the schools we reviewed that were required to submit expenditure reports in fiscal years 2022 through 2024 to determine whether the Department verified if the reimbursement requests were for allowable expenses before approving and paying the requests.

<sup>1</sup> The Department adopted 2 versions of the *School Safety Program Manual*—1 for SROs, school safety officers, and juvenile program officers and 1 for school counselors and social workers. Both versions of the *School Safety Program Manual* are largely the same and include the same Program requirements, but the information provided for understanding the role of the applicable school safety position are different. For example, the version of the *School Safety Program Manual* for SROs, school safety officers, and juvenile probation officers includes information on providing law-related education, whereas the version for school counselors and social workers provides information on developing a counseling program.

<sup>2</sup> Arizona Department of Education (ADE). (2024a). *School safety program manual—School resource officer/school safety officer, and juvenile probation officer*. Retrieved 9/26/2024 from [https://www.azed.gov/sites/default/files/2023/10/SSP%20FY25%20Manual%20for%20SRO\\_SSO%20%26%20JPO%20schools.pdf](https://www.azed.gov/sites/default/files/2023/10/SSP%20FY25%20Manual%20for%20SRO_SSO%20%26%20JPO%20schools.pdf); Arizona Department of Education (ADE). (2024b). *School safety program manual—Counselor and social worker*. Retrieved 9/26/2024 from <https://www.azed.gov/sites/default/files/2023/10/SSP%20FY24%20%20Manual%20for%20CSWs%20schools.pdf>

<sup>3</sup> Arizona Department of Administration (ADOA). (2018). *Arizona grants management manual*. Retrieved 10/22/2024 from <https://grants.az.gov/grant-manual>

<sup>4</sup> We reviewed a random sample of 8 of 332 schools awarded monies for an SRO, juvenile probation officer, or School Security Officer position in fiscal years 2022 through 2024, including 2 schools from urban districts, 2 schools from urban charters, 2 schools from rural districts, and 2 schools from rural charters, and 8 of 593 schools awarded monies for a school counselor or social worker position in fiscal years 2022 through 2024, including 2 schools from urban districts, 2 schools from urban charters, 2 schools from rural districts, and 2 schools from rural charters.

- ▶ To obtain information on school safety issues across the country and in Arizona, we reviewed national and State news reports related to school safety incidents.
- ▶ To obtain information for the Questions and Answers, we:
  - Judgmentally selected 8 states—Alabama, California, Colorado, Illinois, New Mexico, Ohio, Texas, and Virginia—and reviewed applicable school safety information for these states. We selected these states because of their geographic proximity to Arizona, they have developed standalone entities dedicated to school safety, or they were recommended for review by school resource officer stakeholders we contacted. For each of the selected states, we reviewed state statutes and/or rules relating to school safety positions and other school safety requirements, interviewed officials from agencies with school safety-related responsibilities, and reviewed information and documents available on applicable websites.
  - Reviewed the Department's Program application-related documentation, such as scoring rubrics and application guidance documents to obtain information on the Department's criteria for awarding Program grants.
  - Reviewed the Department's Program outreach information, including recorded webinars and other information available on its website, and Department-provided emails and meeting materials; public statements from the State Superintendent of Public Instruction; and legislation related to the Program introduced in the Arizona Legislature during the Fifty-sixth Legislature, second regular session and Fifty-seventh Legislature, first regular session.
- ▶ To provide estimated per student spending for school safety personnel across Arizona and 8 other states and the national average using all 50 states and the District of Columbia, we replicated a process used by the Urban Institute using the latest available data.<sup>5</sup> This process involved first collecting and consolidating state-level survey data on the reported number of school resource officers, school counselors, and social workers and annual state-level occupational mean wages to calculate the total cost of school safety personnel for each state.<sup>6</sup> In addition, to account for employee benefits, average wages were multiplied by 1.6 to estimate the total annual cost of safety personnel.<sup>7</sup> Finally, using student enrollment data, we calculated expenditures per student for each type of school safety position to allow for relative comparisons across states.<sup>8</sup> To estimate the national average of per student spending on school safety personnel, the estimated spending for each state and the District of Columbia was totaled and divided by 51.

<sup>5</sup> Avila-Acosta, M., & Sorensen L. (2023). *Contextualizing the push for more school resource officer funding*. Urban Institute. Retrieved 3/18/2025 from <https://www.urban.org/research/publication/contextualizing-push-more-school-resource-officer-funding>

<sup>6</sup> Office for Civil Rights. (2025). *2021-2022 Civil Rights data collection* [Data set]. U.S. Department of Education. Retrieved 5/6/2025 from <https://civilrightsdata.ed.gov/assets/ocr/docs/2021-22-crdc-data.zip>; U.S. Bureau of Labor Statistics. (2022). *Occupational employment and wage statistics survey* [Data set]. Retrieved 5/6/2025 from <https://www.bls.gov/oes/special-requests/oesm22nat.zip>

<sup>7</sup> U.S. Bureau of Labor Statistics. (2023). *Employer costs for employee compensation – March 2023*. (Report No. USDL-23-1305). Retrieved 5/6/2025 from [https://www.bls.gov/news.release/archives/ecec\\_06162023.pdf](https://www.bls.gov/news.release/archives/ecec_06162023.pdf)

<sup>8</sup> Office for Civil Rights. (n.d.). *2020-2021 State and national tables: Student enrollment* [Data set]. U.S. Department of Education. Retrieved 5/7/2025 from <https://civilrightsdata.ed.gov/estimations/2020-2021>

- ▶ To obtain information for the Introduction, we reviewed Department-prepared information regarding staffing and vacancies and Program applications and grant awards. In addition, we compiled and analyzed unaudited information from the Arizona Financial Information System/*AZ360 Accounting Event Transaction File* and the *State of Arizona Annual Financial Report* for fiscal years 2020 through 2024.

Our work on internal controls included assessing the Department's compliance with *Arizona Grants Management Manual* and Department Program requirements and grant guidance for Program grants it awarded and assessing the effectiveness of its monitoring activities by reviewing participating schools' compliance with Program requirements. We reported our conclusions on internal control deficiencies in Finding 1.

We selected our audit samples to provide sufficient evidence to support our findings, conclusions, and recommendations. Unless otherwise noted, the results of our testing using these samples were not intended to be projected to the entire population.

When relying on Department-provided data to support our findings and conclusions, we performed certain tests to ensure the data was sufficiently valid, reliable, and complete to meet the audit objectives. Unless otherwise noted, we determined the Department-provided data was sufficiently valid, reliable, and complete for audit purposes.

We conducted this performance audit of the Department in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We express our appreciation to the State Superintendent of Public Instruction, Department staff, and sampled school staff for their cooperation and assistance throughout the audit.

## DEPARTMENT RESPONSE

**The subsequent pages were written by the Department to provide a response to each of the findings and to indicate its intention regarding implementation of each of the recommendations resulting from the audit conducted by the Arizona Auditor General.**

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**ARIZONA DEPARTMENT OF  
EDUCATION**

July 30, 2025

Lindsey A. Perry, Auditor General  
Arizona Auditor General  
2910 N. 44<sup>th</sup> Street, Ste. 410  
Phoenix, AZ 85018

Dear Auditor General Perry,

Thank you for allowing our respective staffs to work together to reach consensus on the findings of the School Safety Program audit. After careful review of the revised recommendations, I am happy to report that the Arizona Department of Education (ADE) accepts the audit finding as written. The final analysis has been completed by my office and the revised written responses have been provided in a separate document.

My staff and I are grateful for the opportunity to collaborate with your team on ways to enhance safety in Arizona schools.

Sincerely,

A handwritten signature in blue ink that reads "Tom Horne".

Tom Horne  
Superintendent of Public Instruction

**Arizona Department of Education**

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**Finding 1:** Department did not ensure all schools receiving Program monies complied with Program requirements intended to enhance school safety personnel effectiveness and improve school safety.

Department response: The Auditor General's finding is agreed to.

Response explanation: While the finding is technically accurate, additional context must be provided. As noted in the report, the School Safety Program (SSP) has grown from \$12 million awarded to 128 schools in 2018 to \$128 million awarded to 1,153 schools in 2025, with a SSP Grants team of 4 people. While there is always room for improvement, this four-person team has worked tirelessly to successfully administer the SSP to ensure that Arizona schools have the funding, resources, and training necessary to fill and sustain critical positions across our state. When unmet program requirements are identified, the team takes immediate steps to ensure schools are promptly brought back into compliance.

**Recommendation 1:** Monitor schools receiving Program monies to ensure they comply with Program requirements, consistent with the Grants Manual, and work with schools to address any identified noncompliance.

Department response: The audit recommendation will be implemented.

Response explanation: The Department actively monitors schools' compliance with Program requirements and will implement additional measures to enhance Program oversight, to include the development of specific written policies and procedures to help guide staff and awardees alike.

The Department should develop and implement written policies and procedures for monitoring schools' compliance with Program requirements consistent with the Grants Manual, including:

**Recommendation 2:** Conducting risk assessments of each school participating in the Program using various financial and programmatic factors to determine the level of monitoring needed.

Department response: The audit recommendation will be implemented.

Response explanation: All Local Education Agencies (LEAs) that are awarded funds through the Grants Management Enterprise are assessed for risk annually. The criteria to determine the financial risk of the LEA includes but is not limited to the following: When was the last time an LEA had an audit? What were the results of that audit? What were the results of the LEA Single Audit? Did the LEA submit regular reimbursement requests? Did the LEA submit completion reports on time? How does the LEA perform academically? Did the LEA submit their annual budget on time? Did the LEA submit their Annual Financial Report on time? Additionally, the SSP Grants team is developing a programmatic risk assessment protocol that will assist in the identification of specific factors that will help to determine the level of monitoring needed for awarded schools.

**Recommendation 3:** Completing desk reviews of participating schools' financial and programmatic documentation, such as reviewing schools' end-of-year reports and/or survey

responses to identify potential noncompliance with Program requirements, and conducting additional reviews of specific schools or Program areas where noncompliance was found.

Department response: The audit recommendation will be implemented.

Response explanation: Although current SSP Grants team staffing levels will not allow for desk reviews of all participating schools financial and programmatic documentation, the team is developing protocols that will ensure a representative sample of awarded schools receive desk reviews of key focus areas annually.

**Recommendation 4:** Conducting site visits, as needed.

Department response: The audit recommendation will be implemented.

Response explanation: This recommendation was implemented by the SSP Training team during the 24/25 school year. Plans are being developed for site visits during the 25/26 school year, which will include members of the SSP Grants team as well

**Recommendation 5:** Continue to review schools' Program reimbursement requests to ensure expenses are supported by expenditure reports, prior to approving the payment.

Department response: The audit recommendation will be implemented.

Response explanation: This recommendation has been implemented by the ADE Grants Management Enterprise team.